STATE OF MILITIGAN



## JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY WASTE MANAGEMENT DIVISION

"Better Service for a Better Environment" HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

> INTERNET: www.deq.state.mi.us RUSSELL J. HARDING, Director

REPLY TO

PO BOX 30241 LANSING MI 48909-7741

October 30, 2000

US EPA RECORDS CENTER REGION 5



Ms. Karen Johnson Edison Branch Library 18400 Joy Road Detroit, Michigan 48228-3131

Dear Ms. Johnson:

SUBJECT: Public Display Materials

. . . . .

Detrex Corporation, Detroit; MID 091 605 972

This letter is in follow-up to telephone conversations that I had with both you and Ms. Jennifer Brown of the Detroit Public Library on October 18, 2000. As discussed, the Department of Environmental Quality (DEQ) wishes to use your facility as a public display location for information pertaining to Detrex Corporation, a hazardous waste container storage facility, located at 12886 Eaton Avenue, in Detroit. Public display of these materials is required pursuant to the administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451).

Enclosed please find the following materials for public display:

- 1. The draft operating license prepared pursuant to Part 111 of Act 451.
- 2. The draft federal hazardous waste management permit prepared pursuant to the Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA). This document is being transmitted on behalf of the United States Environmental Protection Agency (U.S. EPA).
- 3. The public notice announcing the DEQ's and the U.S. EPA's intent to issue the operating license and permit, respectively.
- 4. The fact sheet regarding the facility and the draft operating license and permit.
- 5. The hazardous waste management facility operating license application submitted in accordance with Part 111 of Act 451 and the RCRA, as amended by the HSWA.

EQP 0100e

Please make these materials available for public review by November 1, 2000. The materials shall be maintained at your facility until December 20, 2000. I will contact you should the retention period change.

Thank you for your assistance.

If you have any questions, please contact me.

Sincerely,

Ronda L. Blayer

**Environmental Engineering Specialist** 

Waste Management Division

Ronda L. Blayer

517-373-9548

Enclosures

cc: Mr. Nabil Fayoumi, U.S. EPA

Ms. Jeanette Noechel, DEQ - Detroit

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION THOMAS J ANDERSON MARLENE J FLUHARTY KERRY KAMMER O STEWART MYERS DAVID D OLSON RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

STEVENS T MASON BUILDING BOX 30028 LANSING, MI 48909

September 12, 1988

JAN 0 6 1980

Mr. Richard Traub
U.S. EPA, Region V
230 South Dearborn Street
Chicago, Illinois 60604

U. S. EPA, REGION V
SWB — PMS

Dear Mr. Traub:

SUBJECT: Detrex Corporation

MID 091 605 972

On August 15, 1988, the Waste Management Division received a hazardous waste facility operating license application from Detrex Corporation. The facility, located in Detroit, Michigan, currently operates under interim status pursuant to the federal Resource Conservation and Recovery Act (RCRA). Enclosed is one copy of the application and the public notice announcing its receipt. The public notice is scheduled to appear in the Detroit Free Press on September 15, 1988.

Ms. Kathleen Clancy is the permit engineer assigned to review this application. Ms. Clancy expects to complete the review by November 15, 1988. Please proceed with review of the HSWA permit application as appropriate. A copy of all correspondence on this subject should be forwarded to the Waste Management Division. Thank you for your cooperation. If you have any questions, please contact Ms. Clancy (at 517-373-7738) or me.

Sincerely,

Kenneth J. Burda, Chief

Hazardous Waste Permits Section

Waste Management Division

517-373-2730

**Enclosures** 

cc: Operating License Application File

R1026 1/86 ..... 3

\*1

## PUBLIC NOTICE

# RECEIPT OF AN OPERATING LICENSE APPLICATION FOR A HAZARDOUS WASTE FACILITY

The Gold Shield Solvents Division of Detrex Corporation has interim status as a hazardous waste facility pursuant to the Federal Resource Conservation and Recovery Act (RCRA). The Department of Natural Resources (the Department) and the United States Environmental Protection Agency (U.S. EPA), Region V, hereby give notice that on August 15, 1988, Detrex Corporation submitted an operating license application pursuant to the Michigan Hazardous Waste Management Act, 1979 P.A. 64, as amended.

Detrex Corporation operates a hazardous waste storage facility at 12886 Eaton Avenue in Detroit, Michigan. Spent halogenated solvents are stored in containers. The company sells cleaning equipment and the recycled halogenated solvents to small businesses.

The Department is authorized under RCPA to issue and deny licenses for the operation of hazardous waste facilities, except for the portion of a license which relates to the 1984 Hazardous and Solid Waste Amendments (HSWA) to RCRA. HSWA mandates, in part, that hazardous waste management licenses issued after November 8, 1984, require corrective action for all releases of hazardous waste or hazardous constituents to the environment from any solid waste management units at treatment, storage, or disposal facilities seeking licenses. U.S. EPA, in cooperation with the Department is responsible for making a final determination on the HSWA portion of the application. Thus, until the Department receives authorization to administer the HSWA portion of the RCRA program, reviews of applications and issuance or denial of licenses and permits will be conducted jointly.

Department and U.S. EPA staff are currently reviewing the application to determine if it is complete and technically satisfies all state and federal hazardous waste facility licensing requirements. If the application is found to be incomplete, the missing information will be requested from the applicant and the municipality and persons on the facility mailing list will be so notified. As soon as the missing information is provided, the Department will notify the municipality and persons on the facility mailing list and proceed with the technical review of the application. Based upon this review, the Department and U.S. EPA will propose to issue or deny the operating license. Prior to a final determination, a public hearing will be held regarding the tentative decision.

A notice will appear in this publication approximately 30 days prior to the hearing date. At this time, the Department and U.S. EPA are soliciting public comments on the adequacy of the application, the proposed corrective action program, and any issues associated with the facility's past operation. Comments should be sent to the address printed below by November 1, 1988.

The company's application may be reviewed at the Department of Natural Resources, Waste Management Division Office, First Floor, South Ottawa Building in Lansing, Michigan (contact Ms. Kathleen Clancy at 517-373-2730); at the Waste Management Division District Office located at 505 W. Main Street in Northville, Michigan (contact Dr. Benedict Okwumabua at 313-344-4670); and at the Detroit Department of Health, located at 1151 Taylor Street in Detroit, Michigan (contact Mr. Don Hamel at 313-876-4516). Copies of the application may be obtained from the Waste Management Division for the cost of reproduction (approximately \$30), by contacting Ms. Linda Davaloz or Ms. Kathleen Clancy at the address printed below.

Michigan Department of Natural Resources Waste Management Division Box 30028 Lansing, Michigan 48909

To receive future departmental notifications concerning this facility, please submit a written request for placement on the Detrex Corporation operating license application mailing list to Ms. Linda Davaloz at the address printed above. Be sure to include your correct mailing address. Questions regarding the facility should be addressed to Ms. Clancy, the Waste Management Division permit engineer responsible for the review of this application, at 517-373-2730.



JOHN ENGLER Governor

REPLY TO

PO BOX 30241 LANSING MI 48909-7741

## DEPARTMENT OF ENVIRONMENTAL QUALITY WASTE MANAGEMENT DIVISION

"Better Service for a Better Environment" HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

> INTERNET www.deg state.mi.us RUSSELL J. HARDING, Director

> > October 23, 2000

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. David Abler WWJ News Radio 950 26495 American Drive Southfield, Michigan 48034

Dear Mr. Abler:

SUBJECT:

Radio Announcement for Public Hearing

Detrex Corporation, Detroit; MID 091 605 972

Enclosed is a copy of an announcement that the Department of Environmental Quality (DEQ). Waste Management Division (WMD), would like broadcast on WWJ News Radio 950 (WWJ). The announcement provides notice of a public hearing on December 4, 2000 for the draft hazardous waste storage facility operating license and federal permit for Detrex Corporation.

Per our October 17, 2000 telephone conversation, the WMD is requesting that the first public service announcement be broadcast as a paid advertisement. This is necessary due to WWJ's lead time requirements for public service announcements and the WMD's need for proof of the initial broadcast. Based on the information that you provided, it is my understanding that the cost for the paid advertisement is \$250. A purchase order has been requisitioned for this service (copy enclosed).

The first announcement must be broadcast by November 3, 2000. Additionally, please broadcast the announcement as a public service announcement as many times as possible before December 4, 2000.

Thank you for your assistance. If you have any questions, please contact me.

Sincerely.

Ronda L. Blayer

**Environmental Engineering Specialist** Hazardous Waste Program Section

Waste Management Division

Ronda L. Blayer

517-373-9548

Mr. David Abler

Page 2

October 23, 2000

cc/enc: Mr. Nabil Fayoumi, U.S. Environmental Protection Agency

Mr. Jim Sygo, DEQ Mr. Steve Buda, DEQ

Ms. Jeanette Noechel, DEQ - Detroit

## PUBLIC SERVICE ANNOUNCEMENT

The Department of Environmental Quality (DEQ) and the U.S. Environmental Protection Agency have prepared a draft operating license and federal permit for Detrex Corporation. These documents will allow the company to continue operation of its hazardous waste storage facility located at 12886 Eaton Avenue in Detroit.

A public hearing will be held on December 4, 2000, at the DEQ's Detroit Office located at 300 River Place, Suite 3600, in Detroit. The hearing will begin at 7:00 p.m. The public comment period closes on December 19, 2000.

The application, draft license, federal permit, and fact sheet may be reviewed at the Edison Branch Library located at 18400 Joy Road in Detroit.

Contact the DEQ, Waste Management Division, at 517-373-2730, for more information.



# Michigan Department of Environmental Quality Waste Management Division



The following number must appear on all related correspondence, shipping papers, and invoices:

Purchase Order (P.O.) Number: 33200

**VENDOR INFORMATION:** 

SHIP TO:

MDEQ - Waste Management Division 1st floor, Hannah Building 608 W. Allegan St Lansing, MI 48933

P.O. DATE	REQUISITIONER	SHIP VIA	F.O.B. POINT	TERMS
October 17, 2000	Ronda L. Blayer	Not applicable	Not applicable	Not applicable
INDEX	PCA	PROJECT	AGENCY OBJECT	
33200	46032	473001	6145	

	QTY	UNIT	DESCRIPTION		UNIT PRICE	TOTAL
	1	1	Radio announcement on WWJ News Radio 95 4, 2000 public hearing on the draft license for I Detroit, Michigan. The announcement must be 2000. WWJ News Radio 950 must provide co	Detrex Corporation in aired by November 3,	\$250	\$250
_	Chata of Milton		20.000424		SUBTOTAL	\$250
2			ESTIMATED SHIP	PING & HANDLING	\$0	
4 Enter this order in accordance with the prices, terms, delivery method, and specifications listed above, and notify us immediately if you are unable to ship as specified.			OTHER	\$0		
5.	5. Send all correspondence to.		TOTAL	\$250		

Send all correspondence to.

MDEQ - Waste Management Division

P O Box 30241

Lansing, Michigan 48909 Attn.: Ms. Larie McFadden

517-373-8387 ; Fax 517-373-4797

Authorized By

Date

EQ5205 (10/99)

NATURAL RESOURCES COMMISSION

RRY DEVUYST UL EISELE RLENE J FLUHARTY ORDON E GUYER DAVID HOLLI O STEWART MYERS RAYMOND POUPORE



JOHN ENGLER, Governor

#### DEPARTMENT OF NATURAL RESOURCES

STEVENS T MASON BUILDING PO BOX 30028 LANSING, MI 48909

ROLAND HARMES, Director

April 7, 1992

#### CERTIFIED MAIL

Mr. Oscar Frenette WJR Radio 2100 Fisher Building Detroit, Michigan 48202

Dear Mr. Frenette:

SUBJECT: Public Service Announcement

Detrex Corporation

Solvents and Environmental Services Division

MID 091 605 972

Enclosed is a copy of a public service announcement that the Waste Management Division would like broadcast on WJR Radio. The announcement reports a public hearing to be held regarding the draft hazardous waste operating license and federal Resource Conservation and Recovery Act (RCRA) permit for Detrex Corporation, Solvents and Environmental Services Division in Detroit, Michigan. The license and permit will allow Detrex Corporation, Solvents and Environmental Services Division to continue to operate a hazardous waste tank and container storage facility.

The hearing will be held May 21, 1992. Please broadcast the announcement as many times as possible before that date. If you have any questions or comments, please contact me.

Sincerely,

Ronda L. Hall

Environmental Engineer Waste Management Division

517-373-9548

Enclosure

cc: Mr. Richard Traub, U.S. EPA

Mr. Steve Buda, DNR

Mr. Don Mbamah, DNR - Livonia

#### PUBLIC SERVICE ANNOUNCEMENT

The Michigan Department of Natural Resources and the United States Environmental Protection Agency have prepared a draft Act 64 operating license and a draft Resource Conservation and Recovery Act (RCRA) permit for Detrex Corporation, Solvents and Environmental Services Division. The operating license and RCRA permit will allow Detrex Corporation, Solvents and Environmental Services Division to continue to operate its hazardous waste tank and container storage facility located at 12886 Eaton Avenue in Detroit, Michigan.

A public hearing will be held on May 21, 1992, at Cobo Hall, Oakland Zone, Room 0243 in Detroit, Michigan. The hearing will begin at 7:00 p.m. and will continue until all persons have had the opportunity to state their comments for the record. Written comments on the draft operating license may be sent to Michigan Department of Natural Resources, Waste Management Division, P.O. Box 30241, Lansing, Michigan 48909. Comments concerning the RCRA permit may be sent to U.S. EPA, RCRA Permitting Branch, 77 West Jackson Boulevard, Chicago, Illinois 60604. All comments must be postmarked by June 5, 1992.

The application, the draft operating license, the draft RCRA permit, and the facility fact sheet are available for review at the Detroit Department of Health located at 1151 Taylor Street in Detroit, Michigan.

For more information, citizens may contact Waste Management Division staff at 517-373-9548.

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

RRY DEVUYST UL EISELE RLENE J FLUHARTY RDON E GUYER DAVID HOLLI O STEWART MYERS RAYMOND POUPORE



JOHN ENGLER, Governor

## DEPARTMENT OF NATURAL RESOURCES

STEVENS T MASON BUILDING PO BOX 30028 LANSING, MI 48909

ROLAND HARMES, Director April 7, 1992

#### CERTIFIED MAIL

Ms. Pat Vaden WWJ Radio 16550 West Nine Mile Road Southfield, Michigan 48086

Dear Ms. Vaden:

SUBJECT: Public Service Announcement

Detrex Corporation

Solvents and Environmental Services Division

MID 091 605 972

Enclosed is a copy of a public service announcement that the Waste Management Division would like broadcast on WWJ radio. The announcement reports a public hearing to be held regarding the draft hazardous waste operating license and federal Resource Conservation and Recovery Act (RCRA) permit for Detrex Corporation, Solvents and Environmental Services Division in Detroit, Michigan. The license and permit will allow Detrex Corporation, Solvents and Environmental Services Division to continue to operate a hazardous waste tank and container storage facility.

The hearing will be held May 21, 1992. Please broadcast the announcement as many times as possible before that date. If you have any questions or comments, please contact me.

Sincerely,

Ronda L. Hall

Environmental Engineer Waste Management Division

517-373-9548

Enclosure

cc: Mr. Richard Traub/Ms. Shari Kolak, U.S. EPA

Mr. Steve Buda, DNR

Mr. Don Mbamah, DNR - Livonia

#### PUBLIC SERVICE ANNOUNCEMENT

The Michigan Department of Natural Resources and the United States Environmental Protection Agency have prepared a draft Act 64 operating license and a draft Resource Conservation and Recovery Act (RCRA) permit for Detrex Corporation, Solvents and Environmental Services Division. The operating license and RCRA permit will allow Detrex Corporation, Solvents and Environmental Services Division to continue to operate its hazardous waste tank and container storage facility located at 12886 Eaton Avenue in Detroit, Michigan.

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The application, the draft operating license, the draft RCRA permit, and the facility fact sheet are available for review at the Detroit Department of Health located at 1151 Taylor Street in Detroit, Michigan.

For more information, citizens may contact Waste Management Division staff at 517-373-9548.



JOHN ENGLER, Governor

REPLY TO

## DEPARTMENT OF ENVIRONMENTAL QUALITY WASTE MANAGEMENT DIVISION

"Better Service for a Better Environment" HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973 LANSING MI 48909-7741

INTERNET www deg state milus

RUSSELL J. HARDING,

Waste, Perticiles & Toxics Divis

U' EPA-REGION 5

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Rosanna Kelly WJR Radio AM 760 760 Fisher Building Detroit, Michigan 48202

Dear Ms. Kelly:

SUBJECT: Public Service Announcement

Detrex Corporation, Detroit; MID 091 605 972

Enclosed is a copy of a public service announcement that the Department of Environmental Quality (DEQ), Waste Management Division, would like broadcast on WJR radio. The announcement provides notice of a public hearing on December 4, 2000 for the draft hazardous waste storage facility operating license and federal permit for Detrex Corporation.

Please broadcast the announcement by November 3, 2000, and as many times as possible before December 4, 2000.

Thank you for your assistance. If you have any questions, please contact me.

Sincerely,

Ronda L. Blaver

**Environmental Engineering Specialist** Hazardous Waste Program Section Waste Management Division

Sonda L. Blayer

517-373-9548

Enclosure

cc/enc: Mr. Nabil Fayoumi, U.S. Environmental Protection Agency

Mr. Jim Sygo, DEQ Mr. Steve Buda, DEQ

Ms. Jeanette Noechel, DEQ - Detroit

## PUBLIC SERVICE ANNOUNCEMENT

The Department of Environmental Quality (DEQ) and the U.S. Environmental Protection Agency have prepared a draft operating license and federal permit for Detrex Corporation. These documents will allow the company to continue operation of its hazardous waste storage facility located at 12886 Eaton Avenue in Detroit.

A public hearing will be held on December 4, 2000, at the DEQ's Detroit Office located at 300 River Place, Suite 3600, in Detroit. The hearing will begin at 7:00 p.m. The public comment period closes on December 19, 2000.

The application, draft license, federal permit, and fact sheet may be reviewed at the Edison Branch Library located at 18400 Joy Road in Detroit.

Contact the DEQ, Waste Management Division, at 517-373-2730, for more information.

STATE OF MICHIGAN



JOHN ENGLER, Governor

REPLY TO

WASTE MANAGEMENT DIVISION PO BOX 30241 LANSING MI 48909-7741

## DEPARTMENT OF ENVIRONMENTAL QUALITY "Better Service for a Better Environment"

"Better Service for a Better Environment"
HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET www deq state mi us RUSSELL J. HARDING, Director

October 31, 2000

TO:

Mailing List Participants

SUBJECT:

**Detrex Corporation** 

You are receiving a copy of this public hearing notice and fact sheet because you are on the facility-specific mailing list for the Detrex Corporation, located at 12886 Eaton Avenue, in Detroit, Michigan. For further information, please contact Ms. Ronda L. Blayer, Michigan Department of Environmental Quality, Waste Management Division, at 517-373-9548

**Enclosures** 

## **PUBLIC NOTICE**

# INTENT TO ISSUE A STATE HAZARDOUS WASTE MANAGEMENT FACILITY OPERATING LICENSE AND FEDERAL PERMIT TO DETREX CORPORATION

The Michigan Department of Environmental Quality (MDEQ) and the United States Environmental Protection Agency (EPA), Region 5, hereby give notice of their intent to issue a joint operating license and federal permit (pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), and the federal Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA), respectively) to Detrex Corporation. Detrex Corporation currently operates a hazardous waste storage facility for a variety of hazardous wastes. The draft operating license and federal permit would allow Detrex Corporation to continue to operate its facility located at 12886 Eaton Avenue in Detroit, Michigan.

The MDEQ and EPA invite public comment on the draft operating license and federal permit. A public hearing on the draft operating license and federal HSWA permit will be held at 7:00 p.m., on Monday, December 4, 2000, at the Detroit Office of the MDEQ located at 300 River Place, Suite 3600, in Detroit. The public hearing location is accessible to handicapped persons. Any person requiring specialized accommodation or assistance, such as an interpreter for the deaf, meeting materials in Braille, large print, or an audio tape, should contact Ms. Ronda L. Blayer at the address below, or at 517-373-9548 (TDD517-335-4623), by November 20, 2000. The public comment period begins November 3, 2000 and ends December 19, 2000.

The administrative record for the federal permit is on file at the EPA, Region 5 Office, located at 77 West Jackson Boulevard in Chicago, Illinois 60604-3590 (contact Mr. Nabil Fayoumi at 312-886-6840). The administrative record for the draft Part 111 operating license is on file at the MDEQ, Waste Management Division Office, located on the First Floor of the John A. Hannah Building located at 608 West Allegan Street (use P.O. Box 30241 for mailing) in Lansing, Michigan 48909 (contact Ms. Blayer at 517-373-9548). In addition, copies of the draft operating license and federal permit and the associated Fact Sheet are available for review at the MDEQ, Detroit Office, located at 300 River Place, Suite 3600, in Detroit, Michigan (contact Ms. Jeanette Noechel at 313-392-6524); and at the Edison Branch Library, located at 18400 Joy Road, in Detroit, Michigan (contact Ms. Karen Johnson at 313-852-4515).

Comments and requests regarding the draft operating license, and requests to be placed on the facility mailing list, should be sent to Ms. Blayer at the address given above. Comments and requests regarding the federal permit should be sent to Mr. Fayoumi (DRP-8J) at the address given above. Written comments concerning the draft operating license and federal permit should include the name and address of the writer, a concise statement of the basis for the comments, and the supporting relevant facts upon which the comments are based. Written comments must be postmarked no later than December 19, 2000. All other requests for information, including request for copies of the draft operating license, federal permit, and Fact Sheet should be made to Ms. Blayer at the address above.

Before issuing a final decision, the MDEQ and EPA will evaluate all comments received. Information regarding the final decisions on the operating license and federal permit will be communicated to all persons that submit written comments or are on the facility mailing list. The MDEQ and EPA will respond to all significant comments on the draft operating license and federal permits and explain any changes made to thereto.

## **FACT SHEET**

Proposed State Operating License and Federal Permit

for

Detrex Corporation
Hazardous Waste Container Storage Facility

MID 091 605 972

October 2000

Michigan Department of Environmental Quality & United States Environmental Protection Agency

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## LIST OF ATTACHMENTS

	ATTACHMENT 1:	HAZARDOUS WASTE	COMPLIANCE HISTOR
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ATTACHMENT 2: FACILITY MAPS

ATTACHMENT 3: ACCEPTABLE WASTE TYPES

## I. EXECUTIVE SUMMARY

The Michigan Department of Environmental Quality (MDEQ) and the United States Environmental Protection Agency (U.S. EPA) proposes to issue an operating license and federal permit for the Detrex Corporation to operate a hazardous waste container storage facility located in Detroit, Michigan. Section II of this Fact Sheet describes the state program established to regulate hazardous waste and to license hazardous waste treatment, storage, and disposal facilities (TSDFs).

The provisions of R 299.9518 of the Michigan Administrative Code (MAC) require the MDEQ to issue an operating license to operate a hazardous waste TSDF unless: the facility has not been constructed in accordance with approved plans and applicable rules; the construction or operation of the facility presents a hazard to the public health or the environment; or the applicant has not submitted sufficiently detailed or accurate information to enable the Director to make a reasonable judgment on whether to issue the license.

Based on the MDEQ's and U.S. EPA's review of the Detrex Corporation's operating license application and MDEQ site inspections and audits, the MDEQ and U.S. EPA propose that the license be issued because:

- 1. The facility will be operated in accordance with approved plans, applicable rules, and the proposed container storage facility operating license. Section III of this Fact Sheet describes the site, the facility design, and the MDEQ's audit activities.
- 2. The facility does not, at this time, present a hazard to human health or the environment. This conclusion is based on compliance inspections conducted by MDEQ staff. The MDEQ has identified an area of contamination and this area will be addressed as part of the Detrex Corporation's corrective action obligations for the facility. Corrective actions include further investigations, studies, and corrective measures, as necessary, for each area identified. The Detrex Corporation's compliance history is summarized in Attachment 1, Hazardous Waste Compliance History. The Detrex Corporation has generally been responsive in correcting the violations for which it has been cited.
- 3. The operating license application is sufficiently detailed to demonstrate that the facility's design and operation complies with the applicable technical standards. In addition to the conditions contained in all hazardous waste facility operating licenses, the draft license contains conditions specific to the Detrex Corporation's container storage activities. An explanation of these conditions is included in Section III of this Fact Sheet. Section IV of this Fact Sheet addresses the environmental impact of the facility. The portions of the operating license application that describe how the Detrex Corporation will comply with certain regulations have been attached to the draft operating license as enforceable documents, including: the Waste Analysis Plan, Inspection Schedules, Personnel Training, the Contingency Plan, and the Closure Plan. The Hazardous and Solid Waste Amendments of 1984 (HSWA) requirements that will be addressed as part of the federal permit, referenced in Section II of this Fact Sheet, are outlined in Section V of this Fact Sheet.

Although the MDEQ and U.S. EPA believes that it has done a thorough job in reviewing the Detrex Corporation's operating license application, the agencies seek public input on the proposed issuance of the license and permit. Section VI of this Fact Sheet describes the public participation process.

## II. INTRODUCTION

Part 111, Hazardous Waste Management, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), was passed by the Michigan Legislature to regulate the management of hazardous waste from generation to disposal. Likewise the Resource Conservation and Recovery Act of 1976 (RCRA), was passed by the U.S. Congress to regulate hazardous waste nationwide. RCRA was amended substantially by the HSWA. The HSWA and Part 111 of Act 451 require that facilities comply with more stringent standards, and require that any facility seeking a permit must initiate corrective action for environmental releases at the facility from waste management units.

Both RCRA and Part 111 establish a permit system governing the treatment, storage, and disposal of hazardous wastes. RCRA allows the states to obtain authorization to issue a state hazardous waste operating license in lieu of a federal permit. Effective September 11, 2000, the State of Michigan amended its Part 111 Administrative Rules to be equivalent to those under RCRA and applied to U.S. EPA for authorization to administer all portions of the RCRA program except for some of those under HSWA.

Because Michigan is not authorized to issue permits which address all of the HSWA requirements, the MDEQ and the U.S. EPA will continue to, to the extent possible, coordinate the review and issuance of hazardous waste facility permits. The duration of the Part 111 operating license will be ten years.

#### III. FACILITY DESCRIPTION

## A. Facility Location and Design and Construction

The Detrex Corporation operates at 12886 Eaton Avenue in Detroit. The facility is surrounded by various types of land uses including residential to the west and further to the north, and industrial to the north, south, and east. The facility location map is contained in Attachment 2, Facility Maps.

The facility operates as a commercial hazardous waste container storage facility for a variety of hazardous wastes that are collected from such industries as metal working degreasing operations, rubber molding operations, electronic circuit boards and other components defluxing operations, paint spraying equipment operations, and other similar types of industries. Containers of hazardous wastes are accumulated for up to one-year.

The facility consists of two single-story cinder block buildings. Only one of the buildings is used for hazardous waste management operations. Additionally, hazardous wastes may be stored outdoors in containment trailers within a concrete-lined bay surrounded by a fence. A map showing the facility layout,

including hazardous waste storage units, is contained in Attachment 2, Facility Maps. The maximum hazardous waste container storage capacity at the facility is 13,750 gallons.

## B. Facility Specific License Conditions

Part III of the draft operating license contains special conditions for the facility with respect to the types of wastes that may be stored at the facility, the storage capacity of the various units, and the prohibition of bulking of hazardous wastes.

Part IV of the draft operating license contains special conditions pertaining to which waste management units require further corrective action as discussed below.

Part V of the draft operating license contains special conditions pertaining to the schedule of compliance for the construction and modification of some of the indoor container storage units.

## IV. ENVIRONMENTAL IMPACT OF REGULATED UNITS

## A. Wastes Stored

A list of the hazardous wastes that may be stored at the facility by the Detrex Corporation is included as Attachment 3, Acceptable Waste Types. The Detrex Corporation stores a variety of hazardous wastes generated primarily from offsite. Issuance of the facility operating license will authorize the Detrex Corporation to continue to store hazardous waste in containers.

## B. Environmental Monitoring Waivers

The Detrex Corporation has received waivers for groundwater, soil, and air monitoring for its storage facility pursuant to the demonstration it provided to the MDEQ in accordance with R 299.9611.

## C. Corrective Actions

The objective of the corrective action program is to remedy releases of hazardous waste or hazardous constituents that threaten human health or the environment. Corrective actions are generally implemented in four phases which include: a RCRA Facility Assessment (RFA), a RCRA Facility Investigation (RFI), a Corrective Measures Study (CMS), and Corrective Measures Implementation (CMI). A formal corrective action program shall be implemented upon issuance of the operating license. Sixteen waste management units have been identified at the facility. Eight of the waste management units, waste management units 6-13, require no further corrective action based on the design of the units and the available information regarding the units which indicates that no known or suspected releases of contaminants from the units have occurred. Seven of the waste management units, waste management units 1-5, 15, and 16 require no further corrective action because the units are currently operational and do not appear to have any releases of contaminants to the environment and impacts

from the units. Corrective action for these units will be addressed in conjunction with the closure of the facility in the future. The one remaining waste management unit, waste management unit 14, historical fill, requires further corrective action.

The RCRA Facility Assessment: The RFA typically includes a file search (FS), a preliminary review of the information gathered during the FS (PR), a visual site inspection (VSI), and a sampling visit (SV) (if necessary). The objectives of the RFA are: (1) To obtain a thorough understanding of the past and present facility waste management operations; (2) To identify all facility waste management units; (3) To use the FS, PR, and VSI information to assess the potential for a release of hazardous waste or hazardous constituents from each waste management unit; and (4) For each waste management unit to determine if further actions are necessary to protect human health and the environment from a release. Corrective action requirements are addressed in the draft operating license.

The RCRA Facility Investigation: The RFI is used to further characterize and delineate the extent and impact of contaminants from waste management units identified during the RFA. Corrective action requirements are addressed in the draft operating license.

The Corrective Measures Study: During the CMS and based on the information gathered during the RFI, the company will select preliminary technologies for remediation of the facility. These technologies shall be subject to MDEQ approval prior to implementation by the facility.

Corrective Measures Implementation: During the CMI, the facility will implement the technologies for remediation that were approved in the CMS phase of the corrective action process. This is the beginning of actual site wide cleanup efforts.

Interim Measures: Interim Measures (IMs) are used at any stage of the corrective action process to take care of immediate threats to human health or the environment, or specific highly contaminated areas. IMs are also often integrated into the final cleanup remedy for a facility.

## V. HSWA REQUIREMENTS

The federal permit will address requirements for compliance with the land disposal restriction and air emission standards for containers provisions of the HSWA for which the state is not yet authorized.

## VI. PUBLIC PARTICIPATION

## A. Public Comment Procedures

The purpose of public participation is to ensure that the interested public has knowledge of the MDEQ and U.S. EPA proposed actions, and the opportunity to comment on those actions. In addition, the process ensures that the MDEQ and U.S. EPA have the opportunity to benefit from information the public might have relevant to the proposed actions. Comments may be submitted in writing to Ms. Ronda L. Blayer or Mr. Nabil Fayoumi at the addresses listed in Subsection C below between November 3 and December 19, 2000, or comments may be presented at the public hearing. The public comment and public hearing procedures that will be followed are stated in the provisions of R 299.9514 and R 299.9515 of the MAC.

After the close of the public comment period, the MDEQ and U.S. EPA will decide whether to issue the final operating license and federal permit, respectively. Written comments submitted during the public comment period, including any comments provided during any public hearings, will be considered by the Director of the MDEQ and the U.S. EPA to formulate a final decision on the license. Responses to written comments and statements will be included in the record supporting the final decision of the agencies. The final license and permit decision will be communicated to the applicant, each person who submitted a written comment during the public comment period, persons providing written statements at any public hearing that may be held, and all persons on the facility mailing list.

## B. Locations of Available Information

The administrative record for the state hazardous waste facility operating license renewal is on file at the MDEQ, Waste Management Division Office, located on the First Floor of the John A. Hannah Building in Lansing, Michigan (contact Ms. Blayer at 517-373-9548). In addition, copies of the draft operating license, draft federal permit, and the Fact Sheet are available for review at the MDEQ, Detroit Office, located at 300 River Place, Suite 3600, in Detroit, Michigan (contact Ms. Jeanette Noechel at 313-392-6524); and at the Edison Branch Library, located at 18400 Joy Road, in Detroit, Michigan (contact Ms. Karen Johnson at 313-852-4515).

## C. Contact Persons

Comments and requests regarding the state operating license should be addressed to Ms. Ronda L. Blayer, Waste Management Division, MDEQ, P. O. Box 30241, Lansing, Michigan 48909. Comments regarding the federal permit should be addressed to Mr. Nabil Fayoumi (DRP-8J), U.S. EPA, Region 5,77 West Jackson Boulevard, Chicago, Illinois 60604-3590. Written comments concerning the draft operating license or draft federal permit should include the name and address of the writer, a concise statement of the basis for the comments, and the supporting relevant facts upon which the comments are based. All further requests for information, including requests for copies of the draft permit or license and the Fact Sheet should be made to Ms. Blayer at the address printed above. Written comments must be postmarked no later than December 19, 2000.